

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address  Derrick Talerico (SBN 223763) David B. Zolkin (SBN 155410) WEINTRAUB ZOLKIN TALERICO & SELTH LLP 11766 Wilshire Blvd., Suite 730 Los Angeles, CA 90025 Telephone: 424-500-8552 Email: dtalerico@wztslaw.com dzolkin@wztslaw.com	FOR COURT USE ONLY
<input type="checkbox"/> <i>Individual appearing without attorney</i> <input checked="" type="checkbox"/> <i>Attorney for: Broadway Avenue Investments, LLC</i>	
<b>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</b>	
In re:  SEATON INVESTMENTS, LLC, et al.,	CASE NO.: 2:24-bk-12079-VZ (Jointly Administered) CHAPTER: 11
<p><input type="checkbox"/> Affects all Debtors. <input type="checkbox"/> Affects Seaton Investments, LLC (2:24-bk-12079-VZ) <input type="checkbox"/> Affects Colyton Investments, LLC (2:24-bk-12080-VZ) <input checked="" type="checkbox"/> Affects Broadway Avenue Investments, LLC (2:24-bk-12081-VZ) <input type="checkbox"/> Affects SLA Investments, LLC (2:24-bk-12082-VZ) <input type="checkbox"/> Affects Negev Investments, LLC (2:24-bk-12091-VZ) <input type="checkbox"/> Affects Alan Gomperts (2:24-bk-12074-VZ) <input type="checkbox"/> Affects Daniel Halevy (2:24-bk-12075-VZ) <input type="checkbox"/> Affects Susan Halevy (2:24-bk-12076-VZ)</p> <p style="text-align: right;">Debtor(s).</p>	<p><b>NOTICE OF MOTION FOR:</b> ORDER AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING PURSUANT TO 11 U.S.C. SECTION 364</p> <p><b>(Specify name of Motion)</b></p> <p>DATE: November 19, 2024 TIME: 11:00 a.m. COURTROOM: 1368 PLACE: 255 East Temple Street Los Angeles, CA 90012</p>

1. TO (specify name): The Honorable Vincent P. Zurzolo, United States Bankruptcy Judge, and all Parties in Interest:
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendar Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 10/28/2024

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

Printed name of law firm

/s/ Derrick Talerico

Signature

Derrick Talerico

Printed name of attorney

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11766 Wilshire Blvd., Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR (specify name of motion) ORDER AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING PURSUANT TO 11 U.S.C. SECTION 364** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 10/28/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF service list

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) 10/28/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached US Mail service list

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) 10/28/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent P. Zurzolo (Via Priority Mail)  
United States Bankruptcy Court  
255 E. Temple St, Suite 1360  
Los Angeles, CA 90012

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/28/2024

Martha E. Araki

Date

Printed Name

/s/ Martha E. Araki

Signature

Seaton Investments, LLC – Jointly Administered

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrack, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgeppte.com; TSG@ecf.inforuptcy.com; tgaran@aldridgeppte.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girgado:** rgirgado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhllaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpregion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov

Label Matrix for local noticing  
0973-2  
Case 2:24-bk-12081-VZ  
Central District of California  
Los Angeles  
Mon Oct 28 14:54:26 PDT 2024

Los Angeles Division  
255 East Temple Street,  
Los Angeles, CA 90012-3332

~~Archway Broadway Loan SPE, LLC~~  
~~Frandzel Robins Bloom & Csato, L.C.~~  
~~c/o Michael Gerard Fletcher~~  
~~1000 Wilshire Blvd., 19th Fl.~~  
~~Los Angeles, CA 90017-2457 NEF PARTY~~

Broadway Avenue Investments, LLC  
264 S. Oakhurst Dr  
Beverly Hills, CA 90212-3504

802 Mateo Street LLC  
Attn Daniel Halevy  
802 Mateo St  
Los Angeles, CA 90021-1712

Alan D Gomperts  
264 S Oakhurst Dr  
Beverly Hills, CA 90212-3504

Alta Fire Pro  
PO Box 7007  
Mission Hills, CA 91346-7007

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~~c/o Michael Fletcher~~  
~~Frandzel Robins Bloom & Csato, L.C.~~  
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~~Los Angeles, CA 90017-2457 NEF PARTY~~

Archway Real Estate Income  
Fund I SPE I, LLC  
10100 Santa Monica Blvd Ste 500  
Los Angeles, CA 90067-4121

~~Archway Real Estate Income Fund I REIT, LLC~~  
~~Michael Gerard Fletcher~~  
~~c/o FRANDZEL ROBINS BLOOM & CSATO, L.C.~~  
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CA Dept of Tax and Fee Admin  
Account Info Group MIC29  
PO Box 942879  
Sacramento, CA 94279-0029

California Refrigeration & Supply  
1926 Glendon Ave Apt 4  
Los Angeles, CA 90025-4661

Capital One  
PO Box 30285  
Salt Lake City, UT 84130-0285

Commune Events Inc  
802 Mateo St  
Los Angeles, CA 90021-1712

Daniel Halevy  
257 S Linden Dr  
Beverly Hills, CA 90212-3704

Employment Development Dept  
Bankruptcy Group MIC 92E  
PO Box 826880  
Sacramento, CA 94280-0001

Franchise Tax Board  
Bankruptcy Section MS A-340  
PO Box 2952  
Sacramento, CA 95812-2952

Gomperts and Halevy Family Trust  
264 Oakhurst Dr  
Beverly Hills, CA 90212-3504

Halevy Family Trust  
Dated September 6 2010  
257 S Linden Dr  
Beverly Hills, CA 90212-3704

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Joshua Mogin Esq  
Thompson Coburn LLP  
10100 Santa Monica Blvd Ste 500  
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(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE  
ATTN BANKRUPTCY UNIT  
PO BOX 54110  
LOS ANGELES CA 90054-0110

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Sun Valley, CA 91352-2919

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Sharon Gomperts  
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Beverly Hills, CA 90212-3504

Sienna Rose Inc  
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Los Angeles, CA 90013-2210

(p)SOUTHERN CALIFORNIA EDISON COMPANY  
1551 W SAN BERNARDINO ROAD  
COVINA CA 91722-3407

Sue Halevy  
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Beverly Hills, CA 90212-3704

~~United States Trustee (LA)~~ ~~Derrick Talerico~~  
~~915 Wilshire Blvd, Suite 1850~~ ~~Weintraub Zolkin Talerico & Selth LLP~~  
~~Los Angeles, CA 90017-3560~~ ~~11766 Wilshire Blvd~~  
~~NEF PARTY~~ ~~Suite 730~~  
~~Los Angeles, CA 90025-6577~~  
FILING ATTORNEY